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*Proposed Counsel to the Debtors  
 and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK**

	)	Chapter 11
	)	
	)	Case No. 8-19-76260-est
	)	Case No. 8-19-76263-est
In re:	)	Case No. 8-19-76267-est
	)	Case No. 8-19-76268-est
Absolut Facilities Management, LLC, <i>et al.</i>	)	Case No. 8-19-76269-est
	)	Case No. 8-19-76270-est
Debtors. <sup>1</sup>	)	Case No. 8-19-76271-est
	)	Case No. 8-19-76272-est
	)	
	)	(Joint Administration Requested)
	)	

**SUPPLEMENTAL DECLARATION OF MICHAEL WYSE IN SUPPORT  
 OF DEBTORS' CHAPTER 11 PETITIONS AND FIRST DAY MOTIONS**

I, Michael Wyse, hereby declare under penalty of perjury:

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Absolut Facilities Management, LLC (1412); Absolut Center for Nursing and Rehabilitation at Allegany, LLC (7875); Absolut Center for Nursing and Rehabilitation at Aurora Park, LLC (8266); Absolut Center for Nursing and Rehabilitation at Gasport, LLC (8080); Absolut at Orchard Brooke, (1641); Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC (8300); Absolut Center for Nursing and Rehabilitation at Three Rivers, LLC (8133); and Absolut Center for Nursing and Rehabilitation at Westfield, LLC (7924).

1. I am over the age of 18 and am authorized to submit this Declaration on behalf of the Debtors. If called upon to testify, I could and would testify competently to the facts set forth in this Declaration.

2. I am the Chief Restructuring Officer of Absolut Facilities Management, LLC, doing business as Absolut Care LLC, (“**AFM**”), a New York limited liability company with an office located in Roslyn Heights, New York, and of each of the other above-captioned debtors and debtors-in-possession (collectively, with AFM, the “**Debtors**”).

3. I am knowledgeable and familiar with the Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances leading to the commencement of these chapter 11 cases (the “**Chapter 11 Cases**”). Except as otherwise indicated herein, the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by employees of the Debtors or the Debtors’ advisors, or my opinion, which itself would be based on my experience, knowledge, and information concerning the Debtors’ operations. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

4. I submitted a prior declaration (the “**First Day Declaration**”) in connection with the commencement of these Chapter 11 Cases. This supplemental declaration is being submitted to provide information required by Local Rule 1007-4 that was not provided in connection with the First Day Declaration. Attached hereto are the schedules required by Local Bankruptcy Rule 1007-4(vi), (vii) and (xv).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: September 24, 2019  
New York, New York

/s/ Michael Wyse  
Michael Wyse  
Chief Restructuring Officer

## SCHEDULE 4

### **Consolidated List of the Holders of the Five (5) Largest Secured Claims**

Pursuant to E.D.N.Y. LBR 1007-4(a)(vi), the following lists the creditors holding, as of the Petition Date, the five (5) largest secured, non-contingent claims against the Debtors, on a consolidated basis, excluding claims of insiders defined in 11 U.S.C. section 101.

The information contained herein shall not constitute an admission of liability by, nor is it binding on, the Debtors. The Debtors herein reserve all rights to assert that any debt or claim listed herein is a disputed claim or debt, and to challenge the priority, nature, amount or status of any such claim or debt, including the right to challenge any lien. The descriptions of the collateral securing the underlying obligations are intended only as brief summaries. In the event of any inconsistencies between the summaries set forth below and the respective corporate and legal documents relating to such obligations, the descriptions in the corporate and legal documents shall control.

In addition to the parties listed below, the Debtors may have unliquidated and/or contingent claims as a result of parties asserting a security interest against the Debtors' assets through UCC filings.

	Creditor	Contact, Mailing Address (if available)	Amount of Claim	Collateral Description and Value
1	Capital Finance Group Inc.	c/o Blank Rome LLP 444 West Lake Street Suite 1650 Chicago, Illinois 60606	\$5,685,289.90	Substantially all personal property.
2				
3				
4				
5				

## SCHEDULE 5

### Summary of the Debtors' Assets and Liabilities

Pursuant to E.D.N.Y. LBR 1007-4(a)(vii), the following financial data (unaudited and subject to change) is the latest available information and reflects the Debtors' financial conditions as of August 31, 2019.

The following financial data shall not constitute an admission of liability by the Debtors. The Debtors reserve all rights to assert that any debt or claim included herein is a contingent, unliquidated or disputed claim or debt or to challenge the priority, nature, amount or status of any claim or debt.

<b>Balance Sheet</b> <b>Consolidated Absolut Facilities &amp; Mgmt</b> <b>As of August 31, 2019</b>			
<b>ASSETS</b>			
<b>Current Assets</b>			
Cash Incl Savings & Money Mkt		44,639	
Certificates of Deposits		0	
Patient Accounts Receivable		19,692,042	
Allowance for Doubtful Account		(3,827,909)	
Receivables-Officers & Related		25,810,305	
Other Receivables		701,702	
Inventories		56,795	
Prepays and Deposits		4,982,112	
<b>Total Current Assets</b>			<b>47,459,687</b>
<b>Fixed Assets</b>			
Land		0	
Land Improvements		0	
Building		0	
Building Improvements		0	
Leasehold Improvements		12,437,146	
Fixed Equipment		0	
Major Movable Equipment		3,858,293	
Automobiles		62,454	
<b>Total Fixed Assets</b>		16,357,892	
Accumulated Depreciation		(8,236,656)	
Projects in Progress		214,177	
<b>Net Book Value</b>			<b>8,335,414</b>
<b>Other Non-Current Assets</b>			

Patient Funds Held in Trust		0	
Notes Receivable - Long Term		0	
Investments		0	
MRA/MDS Long Term Receivables		130,716	
Other Assets		0	
<b>Total Other Non-Current Assets</b>			<b>130,716</b>
<b>Intangible Assets - Net</b>			
Goodwill - Net		2,665,289	
Mortgage Acquisition Costs-Net		0	
Organization Costs - Net		0	
Lease Finance Costs - Net		0	
<b>Total Intangible Assets - Net</b>			<b>2,665,289</b>
<b>Marketable Securities</b>			
Marketable Securities		0	
Reserve-Marketable Securities		0	
<b>Total Marketable Securities</b>			<b>0</b>
<b>TOTAL ASSETS</b>			<b>58,591,105</b>
<b>LIABILITIES</b>			
<b>Current Liabilities</b>			
Notes & Loans Payable		0	
Current Portion-Long Term Debt		842,787	
Accounts Payable		14,405,107	
Accrued Comp & Related Liab		8,131,437	
Other Accrued Expenses		11,332,373	
Liabilities-Officers & Related		17,132,808	
Construction Contracts		0	
<b>Total Current Liabilities</b>			<b>51,844,512</b>
<b>Non-Current Liabilities</b>			
Long Term Debt		768,556	
MRA/MDS Long Term Liabilities		4,021,714	
Other Non-Current Liabilities		4,674,050	
<b>Total Non-Current Liabilities</b>			<b>9,464,320</b>
<b>TOTAL LIABILITIES</b>			<b>61,308,832</b>
<b>EQUITY</b>			
Additional Paid In Capital		3,103,808	
<b>Capital</b>		<b>3,103,808</b>	
Retained Earnings		9,889,899	

Distributed Retained Earnings		(14,763,499)	
<b>Retained Earnings</b>		<b>(4,873,599)</b>	
<b>Net Income/(Loss) Current Year</b>		<b>(947,936)</b>	
<b>TOTAL EQUITY</b>			<b>(2,717,727)</b>
<b>TOTAL LIABILITIES AND EQUITY</b>			<b>58,591,105</b>

**SCHEDULE 13****Cash Receipts and Disbursements****Net Cash Gain or Loss, Unpaid Obligations and Receivables**

Pursuant to E.D.N.Y. LBR 1007(a)(xvi), the following provides, for the 30-day period following the Petition Date, the estimated cash receipts and disbursements, net cash increase or decrease and obligations and receivables expected to accrue that remain unpaid, other than professional fees, on a consolidated basis.

	<b>Estimated Amount</b>
Cash Receipts	\$4,437,512
Cash Disbursements	\$4,907,796
Net Cash Decrease	(\$470,284)
Unpaid Obligations	\$6,349,958
Unpaid Receivables	\$1,063,783 (October rent)